



**Rina G. Tamburro**  
973.645.4924  
[rtamburro@saiber.com](mailto:rtamburro@saiber.com)

April 12, 2010

**VIA ECF**

Honorable Michael A. Shipp, U.S.M.J.  
United States District Court  
Martin Luther King, Jr. Federal Bldg. &  
U.S. Courthouse  
50 Walnut Street  
Newark, New Jersey 07101

**Re: Serodio v. University of Medicine & Dentistry of New Jersey, et. al.**  
**Docket No. 2:09-cv-2221 (SRC) (MAS)**

Dear Judge Shipp:

This law firm represents defendants University of Medicine and Dentistry of New Jersey, Robert L. Johnson, M.D., I. Thomas Cohen, M.D., Kathy Ann Duncan, M.D., Linda Boyd, D.O., Julie Ferguson, M.B.A., Catherine Bolder, Lisa Pompeo, M.D., Denise V. Rodgers, M.D., and Marjorie C. Brandriss, Ph.D. (together, "defendants") in the above matter. We respectfully submit this letter jointly with Gregg L. Zeff, Esq., counsel for plaintiff Paulo Serodio ("plaintiff"), in order to advise of the parties' positions with respect to settlement. Presently, an in-person settlement conference is scheduled for April 19, 2010.

At the last status conference, Your Honor directed the parties to exchange written discovery by April 2, 2010, and to subsequently advise the Court whether a settlement conference would be meaningful. Pursuant to the Court's directive, the parties have exchanged written discovery, and have conferred regarding settlement. The parties have agreed a settlement discussion would be more meaningful if each side first conducts its key depositions. Therefore, it is respectfully requested that the Court adjourn the settlement conference scheduled for April 19, 2010, to allow the parties sufficient time to conduct depositions in this matter.

Thank you for Your Honor's consideration of this request.

Respectfully submitted,

*/s/ Rina G. Tamburro*

RINA G. TAMBURRO

cc: Gregg L. Zeff, Esq.